

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
MARJORIE GASPARD,

Plaintiff,

-against-

KINGS AUTOSHOW INC. d/b/a BROOKLYN
MITSUBISHI; GM FINANCIAL d/b/a AMERICREDIT
FINANCIAL SERVICES, INC.; LOCATION
SERVICES, LLC d/b/a TCAR RECOVERY SERVICES;
and SOUTHLINE, INC. f/k/a TCAR, INC. a/k/a
TCAR AUTOMOTIVE SERVICES, INC. f/k/a
TCAR AUTOMATIVE SERVINCES, INC. d/b/a
TCAR RECOVERY SERVICES,

Defendants.
-----X

Civil Action No.:
1:20-cv-02896-AMD-LB

**REPLY TO
CROSS-CLAIMS**

Defendant KINGS AUTOSHOW INC. d/b/a BROOKLYN MITSUBISHI (“Defendant”), by
its attorneys, Certilman Balin Adler & Hyman, LLP, as and for its reply to the Cross-Claims of
defendant LOCATION SERVICES, LLC d/b/a TCAR RECOVERY SERVICES, dated February 9,
2021 (hereinafter the “Cross-Claims”) alleges as follows:

**AS AND FOR A RESPONSE TO THE CLAIM ENTITLED “AS AND FOR A CROSS-
CLAIM FOR CONTRACTUAL INDEMNITY AGAINST DEFENDANT, KINGS
AUTOSHOW INC. d/b/a BROOKLYN MITSUBISHI”**

1. Defendant repeats, reiterates, and realleges each and every response previously made
in Defendant’s Answer to the Amended Complaint with the same force and effect as if fully set forth
herein.

2. Denies the truth of each and every allegation set forth in paragraph 2 of the Cross-
Claims and refers all questions of law to the Court.

3. Denies the truth of each and every allegation set forth in paragraph 3 of the Cross-
Claims.

4. Denies the truth of each and every allegation set forth in paragraph 4 of the Cross-Claims.

5. Denies the truth of each and every allegation set forth in paragraph 5 of the Cross-Claims.

6. Denies the truth of each and every allegation set forth in paragraph 6 of the Cross-Claims.

7. Denies the truth of each and every allegation set forth in paragraph 7 of the Cross-Claims.

8. Denies the truth of each and every allegation set forth in paragraph 8 of the Cross-Claims.

9. Denies the truth of each and every allegation set forth in paragraph 9 of the Cross-Claims.

10. Denies the truth of each and every allegation set forth in paragraph 10 of the Cross-Claims.

AS AND FOR A RESPONSE TO THE CLAIM ENTITLED “AS AND FOR A CROSS-CLAIM FOR COMMON LAW INDEMNITY AGAINST DEFENDANT, KINGS AUTOSHOW INC. d/b/a BROOKLYN MITSUBISHI”

11. Defendant incorporates its responses to the prior paragraphs as if fully set forth herein at length and further responds as follows.

12. Denies the truth of each and every allegation set forth in paragraph 12 of the Cross-Claims.

13. Denies the truth of each and every allegation set forth in paragraph 13 of the Cross-Claims.

14. Denies the truth of each and every allegation set forth in paragraph 14 of the Cross-Claims.

AS AND FOR A RESPONSE TO THE CLAIM ENTITLED “AS AND FOR A CROSS-CLAIM FOR CONTRIBUTION AGAINST DEFENDANT, KINGS AUTOSHOW INC. d/b/a BROOKLYN MITSUBISHI”

15. Defendant incorporates its responses to the prior paragraphs as if fully set forth herein at length and further responds as follows.

16. Defendant denies knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 16 of the Cross-Claims and refers all questions of law to the Court.

17. Denies the truth of each and every allegation set forth in paragraph 17 of the Cross-Claims.

18. Denies the truth of each and every allegation set forth in paragraph 18 of the Cross-Claims.

19. Denies the truth of each and every allegation set forth in paragraph 19 of the Cross-Claims.

WHEREFORE, Defendant KINGS AUTOSHOW INC. d/b/a BROOKLYN MITSUBISHI demands judgment dismissing the Cross-Claims of defendant LOCATION SERVICES, LLC d/b/a TCAR RECOVERY SERVICES, for the costs and disbursements in connection with the action and for such and further relief as the Court deems just, equitable, and proper.

[CONTINUED ON FOLLOWING PAGE]

Dated: East Meadow, New York
March 2, 2021

CERTILMAN BALIN ADLER & HYMAN, LLP

By: /s/Joshua Feldman

Joshua Feldman, Esq.

*Attorneys for Defendant Kings Autoshow Inc. d/b/a
Brooklyn Mitsubishi*

90 Merrick Avenue – 9th Floor
East Meadow, New York 11554
(516) 296-7000

jfeldman@certilmanbalin.com

To (via ECF):

Nitin Sain, Esq.

KENNEDYS CMK LLP

Attorneys for Defendant Location Services, LLC

d/b/a TCAR Recovery Services

570 Lexington Avenue – 8th Floor

New York, New York 10022

(646) 625-4000

nitin.sain@kennedyslaw.com

Daniel A. Schlanger, Esq.

SCHLANGER LAW GROUP LLP

Attorneys for Plaintiff

80 Broad Street, Suite 1301

New York, New York 10004

(212) 500-6114

dschlanger@consumerprotection.net

R. David Lane Jr., Esq.

MARSHALL DENNEHEY WARNER

COLEMAN & GOGGIN

Attorneys for Defendant AmeriCredit Financial Services

d/b/a GM Financial Services

Wall Street Plaza

88 Pine Street, 21st Floor

New York, New York 10005

(212) 376-6413

rdlane@mdwgcg.com